

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.

10801 W. CHARLESTON BLVD.

SUITE 500

LAS VEGAS, NV 89135

TELEPHONE: 702.369.6800

ANTHONY L. MARTIN

Nevada Bar No. 8177

[anthony.martin@ogletree.com](mailto:anthony.martin@ogletree.com)

DANA B. SALMONSON

Nevada Bar No. 11180

[dana.salmonson@ogletree.com](mailto:dana.salmonson@ogletree.com)

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.

10801 W. Charleston Blvd.

Suite 500

Las Vegas, NV 89135

Telephone: 702.369.6800

Fax: 702.369.6888

*Attorneys for Defendant TELUS International (U.S.) Corp.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

BRIELLE MEAGHER, individually, and on  
behalf of all others similarly situated,

Plaintiff,

vs.

TELUS INTERNATIONAL (U.S.) CORP.,

Defendant.

Case No.: 2:20-cv-02074-RFB-DJA

**STIPULATION AND ORDER TO EXTEND  
TIME TO FILE JOINT MOTION FOR  
PRELIMINARY CLASS ACTION  
APPROVAL**

*(Second Request)*

Pursuant to LR IA 6-1, LR IA 6-2 and LR 7-1, Plaintiff Brielle Meagher (“Plaintiff”) and Defendant TELUS International (U.S.) Corp (“Defendant”) (collectively referred to as “the Parties”), by and through their respective undersigned counsel, hereby stipulate and agree to a three-week extension of time for the Parties to file their Joint Motion for Preliminary Class Action Approval (“Joint Motion”). The current deadline is January 12, 2022. This is the Parties’ second request to extend the Joint Motion deadline. The first request was made on December 17, 2021 as defense counsel was dealing with a family emergency that delayed the parties in finalizing the documents for filing. (ECF No. 35.) That Stipulation was granted on December 20, 2021. (ECF No. 36.)

Good cause exists to extend the deadline a second time. The parties are in the process of finalizing all of the settlement documents, including their Joint Motion, Notice, Claim Forms, etc.;

however, defense counsel need additional time gathering and finalizing the putative Plaintiff data to include in the settlement documents and finalize ahead of providing the information to the Third Party Administrator (“TPA”) so that the parties can obtain a cost quote to include in the Joint Motion and related settlement documents. As a result, the parties would like until February 1, 2022 to submit the Joint Motion.

This Stipulation is made in good faith and is not intended for purposes of delay.

DATED this 12th day of January, 2022. DATED this 12th day of January, 2022.

BROWN, LLC

OGLETREE, DEAKINS, NASH, SMOAK & STEWART,  
P.C.

/s/ Nicholas R. Conlon

/s/ Dana B. Salmonson


Nicholas R. Conlon (*admitted pro hac vice*)  
Jason T. Brown (*admitted pro hac vice*)  
111 Town Square Place, Suite 400  
Jersey City, NJ 07310

Anthony L. Martin  
Nevada Bar No. 8177  
Dana B. Salmonson  
Nevada Bar No. 11180  
10801 W. Charleston Blvd.  
Suite 500  
Las Vegas, NV 89135  
*Attorneys for Defendant*

Don Springmeyer  
Nevada Bar No. 1021  
KEMP JONES, LLP  
3800 Howard Hughes Parkway  
Wells Fargo Tower, 17th Floor  
Las Vegas, NV 89169  
*Attorneys for Plaintiff*

**ORDER**

IT IS SO ORDERED.

  
**RICHARD E. BOULWARE, II**  
**United States District Court**

DATED this 13th day of January, 2022.